## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re

Lordstown Motors Corp., et al.,1

Debtor.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PAPERS

PLEASE TAKE NOTICE that Skadden, Arps, Slate, Meagher & Flom LLP hereby appears in the above-captioned case (the "Chapter 11 Case") as counsel for LAS Capital LLC ("LAS"), pursuant to section 1109(a) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 9010(b) of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules"), and Rule 2002-1(d) of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the "Local Bankruptcy Rules"), and requests copies of any and all notices and papers filed or entered in this Chapter 11 Case be given to and served upon the following:

Joseph O. Larkin, Esq. Stephen J. Della Penna, Esq. Skadden, Arps, Slate, Meagher & Flom LLP One Rodney Square, 920 N. King Street Wilmington, Delaware 19801

Telephone: (302) 651-3000

Fax: (302) 651-3001

Email: Joseph.Larkin@Skadden.com

Ron E. Meisler, Esq. Jennifer Madden, Esq.

Skadden, Arps, Slate, Meagher & Flom LLP

155 North Wacker Drive Chicago, Illinois 60606-1720 Telephone: (312) 407-0549

Fax: (312) 407-8641

Email: Ron.Meisler@Skadden.com
Email: Jennifer.Madden@Skadden.com

The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Robert D. Drain, Esq. Skadden, Arps, Slate, Meagher & Flom LLP One Manhattan West New York, NY 10001 Telephone: (212) 735-3000

Fax: (212) 735-2000

Email: Robert.Drain@skadden.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, a request for service of all orders and notices of any application (including those required by Bankruptcy Rule 2002 and Local Bankruptcy Rule 2002-1), motion, petition, pleading, request, chapter 11 plan, disclosure statement, complaint, or demand, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise filed or made with regard to the Chapter 11 Case and any and all adversary proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice or any subsequent appearance, pleading, claim or suit is intended to nor shall be deemed to waive LAS' rights (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution, (2) to have final orders in non-core matters entered only after *de novo* review by a higher court, (3) to trial by jury in any proceeding so triable herein or any case, controversy, or proceeding related to hereto, (4) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which LAS is or may be entitled under agreements, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

PLEASE TAKE FURTHER NOTICE that LAS does not consent to the entry of final orders or judgments by the Court if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: Wilmington, Delaware October 17, 2023

## SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

## /s/ Joseph O. Larkin

Joseph O. Larkin (I.D. No. 4883) Stephen J. Della Penna (ID No. 6103) One Rodney Square 920 N. King Street Wilmington, Delaware 19801 Telephone: (302) 651-3000

Fax: (302) 651-3001

Joseph.Larkin@Skadden.com

- and -

Ron E. Meisler (*pro hac vice* admission forthcoming) Jennifer Madden (*pro hac vice* admission forthcoming) 155 North Wacker Drive Chicago, Illinois 60606-1720 Telephone: (312) 407-0549

Fax: (312) 407-8641

Ron.Meisler@Skadden.com Jennifer.Madden@Skadden.com

- and -

Robert D. Drain (pro hac vice admission forthcoming)

One Manhattan West New York, NY 10001 Telephone: (212) 735-3000

Fax: (212) 735-2000

Robert.Drain@Skadden.com

Counsel to LAS Capital LLC

Case 23-10831-MFW Doc 566 Filed 10/17/23 Page 4 of 4

**CERTIFICATE OF SERVICE** 

I, Joseph O. Larkin, certify that on October 16, 2023, I caused the foregoing

Notice of Appearance and Request for Service of Notices and Papers to be served by electronic

transmission using the Court's CM/ECF system on all parties who have registered to receive

notifications in this case.

/s/ Joseph O. Larkin

Joseph O. Larkin